

Objection Deadline: December 5, 2016

CAHILL GORDON & REINDEL LLP
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Special Litigation Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
	:	
In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**FOURTH MONTHLY STATEMENT OF CAHILL GORDON & REINDEL LLP
AS SPECIAL LITIGATION COUNSEL TO THE DEBTORS FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM OCTOBER 1, 2016 THROUGH OCTOBER 31, 2016**

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Kinja Kft. (5056). The offices of Gawker Media LLC and Gawker Media Group, Inc. are located at 114 Fifth Avenue, 2d Floor, New York, NY 10011. Kinja Kft.'s offices are located at Andrassy ut 66. 1062 Budapest, Hungary.

Name of Applicant: Cahill Gordon & Reindel LLP

Authorized to Provide
Professional Services to: The Debtors

Date of Retention: August 11, 2016 *nunc pro tunc* to June 10, 2016

Period for Which Compensation and/or
Reimbursement is Sought: October 1, 2016, through
and including October 31, 2016

Total Amount of Compensation Sought
At Agreed Discounted Rates Fees: \$18,403.40
(Not Applying 20% Holdback for Fees) Expenses: \$56.97

This is a(n) X monthly ___ interim ___ final application. No prior application was filed for this Fee Period.²

² Notice of this Monthly Fee Statement (as defined herein) will be served in accordance with the Interim Compensation Order (as defined herein), and any objections to the relief requested in this Monthly Fee Statement must be addressed in accordance with the Interim Compensation Order.

Summary Chart of Previous Monthly Fee Statements and Fee Applications

Monthly Fee Statements					
Date Filed	Period Covered	Fees Requested	Expenses Requested	Fees Paid to Date	Expenses Paid to Date
August 19, 2016	6/10-7/31/16	\$31,557.20	\$709.26	\$25,245.76	\$709.26
September 19, 2016	8/1/16-8/31/16	\$25,440.00	\$99.16	\$20,352.00	\$99.16
October 19, 2016	9/1/16-9/30/16	\$7,360.00	\$32.50	\$5,888.00	\$32.50
Fee Applications					
Date Filed	Period Covered	Fees Requested	Expenses Requested	Fees Paid to Date	Expenses Paid to Date
November 7, 2016	6/10/16-9/30/16	\$64,357.20	\$840.92	\$51,485.76	\$840.92

Pursuant to sections 327, 330, and 331 of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered by this Court on July 13, 2016 [Docket No. 94] (the “Interim Compensation Order”), Cahill Gordon & Reindel LLP (“Cahill”), Special Litigation Counsel to the debtors and debtors in possession in these proceedings (the “Debtors”) with respect to the Mail Media Litigation (as defined in the Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Cahill dated July 25, 2016 (the “Cahill Retention Application”) [Docket No. 131]³), hereby files this monthly fee statement (this “Monthly Fee Statement”) for the period of October 1, 2016 through and including October 31, 2016 (the “Fee Period”) for (a) compensation in the amount of \$18,403.40⁴ for the actual and necessary legal services rendered by Cahill to the Debtors during the Fee Period (80% of which is \$14,722.72), and (b) reimbursement for the actual and necessary expenses incurred by Cahill during the Fee Period in the amount of \$56.97.

Itemization of Services Rendered and Disbursements Incurred

In support of this Monthly Fee Statement, attached are the following exhibits:

Exhibit A is a schedule of the number of hours expended and fees incurred on an aggregate basis by Cahill’s attorneys during the Fee Period with respect to certain categories.

³ The Cahill Retention Application was granted by Order dated August 11, 2016 [Docket No. 169].

⁴ As disclosed in the Cahill Retention Application, Cahill is charging special discounted hourly rates, well below Cahill’s usual and customary rates, that were agreed upon for this matter. The discount amounts to approximately \$7,000 for this period.

Exhibit B is a schedule providing certain information regarding the Cahill attorneys and paraprofessionals for whose work compensation is sought in this Monthly Fee Statement. Attorneys have expended a total of 23.30 hours in connection with the Debtors during the Fee Period.

Exhibit C is a schedule setting forth the total amount of reimbursement sought with respect to each category of expenses for which Cahill is seeking reimbursement in this Monthly Fee Statement.

Exhibit D consists of Cahill's invoice rendered to, and approved by, the Debtors, which includes time detail and records of fees and expenses incurred during the Fee Period.

WHEREFORE, Cahill requests that it be allowed reimbursement for its reasonable fees and expenses incurred during the Fee Period in the total amount of \$14,779.69, consisting of (a) \$14,722.72, which is 80% of the reasonable fees incurred by the Debtors for actual and necessary professional services rendered by Cahill, and (b) \$56.97 for actual and necessary costs and expenses, and that such fees and expenses be paid as administrative expenses of the Debtors.

Dated: November 18, 2016
New York, New York

/s/ Joel H. Levitin
Susan Buckley
Joel H. Levitin
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New York, New York 10005
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*Special Litigation Counsel to the
Debtors and Debtors-in-Possession*

EXHIBIT A

Statement of Fees by Subject Matter

Project Category	Total Hours Billed	Total Fees Requested
Mail Online Litigation	15.50	\$12,163.40
Fee Applications and Statements	7.80	\$6,240.00
TOTAL	23.30	\$18,403.40

EXHIBIT B

Attorney Information

Attorney	Position	Year First Admitted to Bar	Department	Hourly Billing Rate⁵	Total Hours Billed	Total Compensation
Susan Buckley	Partner	1978	Media Litigation	\$800	17.90	\$14,320.00
Joel H. Levitin	Partner	1987	Bankruptcy & Restructuring	800	4.70	\$3,760.00
Julia Wood	Associate	2012	Media Litigation	462	0.70	\$323.40
TOTAL					23.30	\$18,403.40

Blended Hourly Rate: \$789.95

⁵ As disclosed in the Cahill Retention Application, Cahill is charging special discounted hourly rates, well below Cahill's usual and customary rates, that were agreed upon for this matter. The discount amounts to approximately \$7,000 for this period.

EXHIBIT C

Summary of Actual and Necessary Expenses for the Fee Period⁶

Service Description	Amount
Court Costs	\$40.72
Word Processing	16.25
Total	\$56.97

⁶ Cahill submits that these expenses are reasonable and economical, are the type of expenses that are customarily charged to Cahill's non-bankruptcy clients, and reflect the actual amounts billed to, or paid by, Cahill on behalf of the Debtors.

EXHIBIT D

FED. TAX ID NO. 13-5510029

WIRE TRANSFER

HSBC BANK USA, 110 WILLIAM STREET, N.Y., N.Y. 10038

ABA #021001088

CAHILL GORDON & REINDEL LLP

A/C #015-70965-5

BILL NO.

Gawker Media, LLC
c/o Opportune LLP
10 East 53rd Street
33rd Floor
New York, NY 10022

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702

245734

November 15, 2016

Re: DIP Special Litigation Counsel

For professional services rendered in connection with the DIP Special Litigation Counsel matter during the period ended October 31, 2016.....	\$ 18,403.40
Disbursements and charges	56.97
TOTAL	<u>\$ 18,460.37</u>

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DIP Special Litigation Counsel
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FOR PROFESSIONAL SERVICES RENDERED

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
10/03/16	Buckley, S	E-corr. WHolden re: revised draft (.10); respond to questions from GGallardi re: settlement (.10)	0.20
10/04/16	Buckley, S	Rev. response from Will Holden (.10); revise current draft of agreement per same (.40); arrange for redline for opposing counsel (.10); further revisions on agreement (.40); corr. Holden re: timing (.20); corr. opposing counsel with revised draft (.20); mem. to James King (.20)	1.60
10/05/16	Buckley, S	Communications with WHolden re: settlement issues (.20)	0.20
10/12/16	Buckley, S	Rev. mem. from opposing counsel re: settlement details (.20); mem. to James King requesting his consent (.20); mem. to WHolden re: settlement posture and request for details (.40); rev. prior discussions re: illustration to respond (.20)	1.00
10/13/16	Buckley, S	E-corr. JKing re: reactions to settlement agreement (.10); further communications James King (.20)	0.30
10/14/16	Buckley, S	Communications with opposing counsel re: final settlement details (.20); e-corr. to/from WHolden re: status of consultant (.20)	0.40
10/17/16	Levitin, JH	Review and revise fee statement.	0.40
10/17/16	Buckley, S	Prepare September monthly statement (1.70); communications with JLevitin re: same (.20); revise statement to incorporate JL suggestions and new additions to chart (.40)	2.30
10/18/16	Levitin, JH	Discussions w/ S Buckley re finalizing fee statement.	0.10
10/18/16	Buckley, S	Rev. JOliveri mem. re: parties needed to sign (.20); research corr. in June re: same (.30); respond to JOliveri re: request to substitute/remove Mail Media (.40); e-corr. to/from WHolden re: status of consultant (.20); TC JLevitin re: filing/service of monthly statement (.20); inquiries re: fees and expenses received to date (.40); e-corr. to Holden re: approval of September statement (.10)	1.80

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DIP Special Litigation Counsel
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<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
10/19/16	Levitin, JH	Discussions w/ S Buckley re settlement issues.	0.20
10/19/16	Buckley, S	E-corr. and TC with JLevitin re: entity issue raised by plaintiffs (.30); e-corr. and TC JWood re: motion to amend/substitute (.40); rev. King employment contract (.30); finalize monthly fee statement and corr. re: filing and service (.50); draft response to plaintiffs counsel's comments/revisions on settlement documents and circulate (.50); rev. comments from internal team re: same (.20); revise corr. to plaintiffs counsel and circulate (.20); communications with Ropes and Gray (.20); rev. current draft of settlement docs re: Daily Mail entity issue (.20); e-corr. and TC JWood re: same (.20)	3.00
10/19/16	Wood, JK	Review James King independent contractor agreement and settlement agreement (.30); review emails from Mr. Oliveri re: entity for settlement agreement and consider consequences (.30); discuss with Ms. Buckley (.10).	0.70
10/20/16	Buckley, S	Communications with opposing counsel re: DM entity issue for settlement documents (.50); communications with WHolden re: issues concerning Gawker's effectuation of settlement (.30)	0.80
10/24/16	Levitin, JH	Discussions w/ S Buckley regarding settlement details and logistics.	0.20
10/24/16	Buckley, S	Communications with JLevitin re: plaintiffs proposal to amend its pleading in conjunction with settlement (.30); communications with MMcLaughlin re: procedures available in NYS to deal with plaintiffs issue (.30); draft proposed notice and transmit to plaintiffs counsel for potential resolution of entity issue (.50)	1.10
10/25/16	Buckley, S	Communications with Will Holden re: status of settlement (.20); prep. package of current drafts of all settlement papers for WHolden (.60); rev. WHolden draft instructions for settlement and respond (.20)	1.00
10/26/16	Buckley, S	Communications with Managing Clerks re: status conference tomorrow (.30); pull and review scheduling order in prep. for conference (.20); corr. to plaintiffs counsel re: status of settlement (.20)	0.70
10/27/16	Buckley, S	Attend status conference before Justice Reed including discussions with law secretary and courtroom deputy re: adjournment (2.50); communications with local counsel	3.50

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DIP Special Litigation Counsel
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November 15, 2016

<u>DATE</u>	<u>NAME</u>	<u>DESCRIPTION</u>	<u>HOURS</u>
		re: plaintiffs, Clare Locke and WHolden re: proceedings in court (1.0)	
10/31/16	Levitin, JH	Review of sale filings re assumption of liabilities (1.50); discussions with S. Buckley re: same (.20); discussions with G. Galardi re: payments (.30); discussions with J. Gill re: APA terms (.30); begin preparation of first interim fee application (1.50).	3.80
			<hr/>
TOTAL TIME			23.30

-----TIME RECAP-----

<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
Buckley, S	800.00	17.90	14,320.00
Levitin, JH	800.00	4.70	3,760.00
Wood, JK	462.00	0.70	323.40
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TOTAL		23.30	\$18,403.40

<u>DISBURSEMENTS AND CHARGES</u>	<u>AMOUNT</u>
Court Costs	40.72
Word Processing	16.25
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Total Disbursements	\$56.97